

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:	Case No. 14-06578
Ashleigh J. Sunderlin	Ch. 13 Proceeding
	Hon. James W. Boyd
Debtor	Filed 10/14/2014

Ashleigh J. Sunderlin

Plaintiff, Adv. Pro. 21-80010
vs.

Wells Fargo, N.A., and Navient Solutions,
Inc.

Defendants.

CONSENT MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Federal Rule of Bankruptcy Procedure 7001, Plaintiff Ashleigh J. Sunderlin respectfully requests that the Court grant her leave to file a Second Amended Complaint in order to add Turnstile Capital Management, LLC & Boston Portfolio Advisors, Inc. as defendants in this matter. A copy of the Second Amended Complaint is attached to this motion as **Exhibit A**. Plaintiff has conferred with Defendants in this matter, and has confirmed that all parties have consented to this motion.

Plaintiff filed the Complaint in this matter on 01/21/2021 against Wells Fargo, N.A., Navient Solutions, Inc., and the Pennsylvania Higher Education Assistance Agency (“PHEAA”). After serving the Complaint on PHEAA, it was discovered that PHEAA was not a proper defendant in this matter and they were dismissed from this matter on 06/02/2021. Plaintiff has now learned that Turnstile Capital Management, LLC & Boston Portfolio Advisors, Inc. are the proper parties that own the two loans previously believed to have been owned by PHEAA. Plaintiff now seeks

to add these parties as defendants in this matter.

Under Rule 15(a)(2) of the Federal Rules of Civil Procedure, a party may amend its pleading if the opposing party consents to the amendment in writing. Fed. R. Civ. P. 15(a)(2). The only difference between the proposed Second Amended Complaint and the First Amended Complaint is that the aforementioned parties are being added as defendants.

Therefore, Plaintiff respectfully requests that the Court grant Plaintiffs leave to file the Second Amended Complaint. A proposed order is attached.

Respectfully Submitted,

Dated: 08/09/2021

/s/Jeff Mapes

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